

REMARKS

Claims 25-124 are pending in the application. Claims 60-96, 123 and 124 have been withdrawn by virtue of a provisional election, with traverse, of Group I claims by the undersigned, which is hereby affirmed by the Applicants. Claims 25-59 and 97-122 stand rejected. Reconsideration of the claim rejections in view of the above amendments and the following remarks is respectfully requested.

Information Disclosure Statement

Applicants respectfully submit that they are aware of the requirements under 37 CFR 1.98 with regard to consideration of references. The Examiner requests a copy of the reference listed on page 14, lines 2-3 of the Office Action. At this time the reference is not readily available. However, Applicants will try to retrieve a copy of the reference.

Claim Rejections- 35 U.S.C. § 112

Claim 103 has been amended to depend from claim 97. Accordingly, withdrawal of the rejection is requested.

Claim Rejections- 35 U.S.C. § 103(a)

Claims 25-36, 40-59 and 97-122 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,850,629 to Holm et al., for the reasons set forth on pages 4-9 of the Office Action. Moreover, Claims 37-39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Holm in view of the article by Anderson, for the reasons set forth on pages 9-10 of the Office Action.

It is respectfully submitted that at the very minimum, the teachings of Holm is legally deficient to establish a *prima facie* case of obviousness against independent claims 25 and 97.

Holms discloses nothing more than a TTS (text-to-speech) system that can be implemented in a GUI system for converting textual data extracted from a word processing file to speech output. It is respectfully submitted that the teachings of Holm is fundamentally different from the claimed inventions and it cannot be reasonably argued that Holm teaches or suggests the claimed inventions, as a whole, which is required to establish a *prima facie* case of obviousness.

For instance, Holm does not teach or suggest a conversational computing system comprising *a multi-modal CUI (conversational user interface) manager, operatively connected to a plurality of I/O (input/output) renderers, for receiving input queries and input events across different user interface modalities and generating output messages and output events in connection with an active application in one or more the different user interface modalities*, as recited in claim 25. Indeed, Holms disclose a single input modality, GUI, for Windows application.

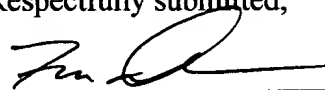
Similarly, Holm does not disclose or suggest a conversational virtual machine comprising, *a kernel adapted to manage dialog and context, conversational engines and resources and communication across one of platforms, applications, devices and a combination thereof, having different user interface modalities, to provide a coordinated, universal conversational user interface (CUI) across the different user interface modalities*, as recited in claim 97. In fact, FIGs. 7 and 8 of Holm clearly show a window kernel function (208) being separate and independent from the TTS kernel (250) of the TTS controller (204).

Therefore, for at least the above reasons, claims 25 and 97 are patentable and nonobvious over Holm. Moreover, all pending claims that depend from claims 25 and 97 are patentable over Holm and the combination of Holm and Anderson at least by virtue of their dependence from

claim 25 and 97, although Applicants submit that such claims are clearly patentable over the cited art of record.

In view of the foregoing amendments and remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,



Frank V. DeRosa

Registration No. 43,584

F. Chau & Associates, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL (516) 692-8888
FAX (516) 692-8889